

EXHIBIT M45

UDL LABORATORIES, INC.

MEMORANDUM

TO: Executive Staff
FROM: Li Radtke
DATE: January 21, 2008
RE: Actavis Totowa Re-Assessment Summary

Regulatory Affairs/Compliance has completed its evaluation of Actavis Totowa. The following is a summary of the review:

Background Information:

Actavis Totowa has been approved by UDL as a supplier of pharmaceutical drug products since 2004 when the company operated as Amide Pharmaceuticals, Inc. UDL currently purchases three product families manufactured by Actavis, Little Falls, New Jersey. They include: Digitek (Digoxin) Tablets (manufactured by Actavis, but purchased through Mylan), [REDACTED] and most recently, [REDACTED]

In mid-2005, Amide was purchased by Actavis Group, an Iceland-based global maker of generic drugs. A copy of Amide's corporate profile is included at the end of this summary (Attachment 1). UDL is an Authorized Distributor of Records (ADR) for Actavis Totowa.

FDA Inspection Summaries -

The last known FDA inspection took place in September 2007. Attachment 2 contains summaries of inspections and/or 483s for:

September 5 – 28, 2007 (3 point 483/response. EIR not available)
Summary of 483s and Warning Letters (1999 – 2007)

FOI request –

Inspectional information must be obtained through FOI. The last review of available information was performed on January 21, 2008. It was verified that the information we currently have on file is more current than what is available through this service.

Supplier Questionnaire –

An updated Supplier Questionnaire was obtained in November 2007.

Recall History –

Our search produced the following recalls:

Date: August 10, 1995
Product: [REDACTED]
Class: III
Reason: Incorrect Package Insert.

Date: December 1990
Product: [REDACTED]
Class: II
Reason: Variation in tablet size resulting in sub- and super-potency.

Compliance Background/History –

See Attachment 2.

Note: In March 1992, Amide Pharmaceuticals, Inc. entered into a consent decree. Amide sought relief from the injunction in June 1999. It was denied based on the status of Amide's compliance history. The actual date when the consent decree was lifted could not be determined. We do know that there are currently not operating under a consent decree.

Certificate of Liability Insurance –

Actavis carries Liability Insurance in the amount of \$10,000,000 per occurrence.

Agreements –

The following agreements are on file:

Confidentiality Agreement, dated June 15, 2006 (Through Actavis/Iceland)

Product Guarantee and Indemnification Agreement, dated December 2, 2003

Supplier Formulation/Change Agreement, dated February 2, 2003

NOTE: A Supply/Quality Agreement is currently being worked on through Actavis Corporate.

Stability –

All products currently sourced from Actavis, Little Falls are USP. Actavis is not conducting any stability for UDL.

cc: Jodi Eichelberger
John Ford
Sue Powers
Kriss Spors